

Michael P. Kenny, Esq. (admitted *pro hac vice*)  
mike.kenny@alston.com  
Debra D. Bernstein, Esq. (admitted *pro hac vice*)  
debra.bernstein@alston.com  
Matthew D. Kent (admitted *pro hac vice*)  
matthew.kent@alston.com

**ALSTON & BIRD LLP**  
1201 West Peachtree Street  
Atlanta, Georgia 30309-3424  
Tel: (404) 881-7000  
Facsimile: (404) 881-7777

James M. Wagstaffe, Esq. (SBN 95535)  
wagstaffe@kerrwagstaffe.com

**KERR & WAGSTAFFE LLP**  
101 Mission Street, 18th Floor  
San Francisco, California 94105-1576  
Tel: (415) 371-8500  
Facsimile: (415) 371-0500

*Attorneys for Plaintiffs Dell Inc. and Dell Products L.P.*

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DELL INC. and DELL PRODUCTS L.P.,  
Plaintiffs,  
v.  
HITACHI, LTD., *et al.*,  
Defendants.

Master File No. 3:07-cv-05944-SC

MDL No. 1917

Individual Case No. 3:13-cv-02171-SC

**[PROPOSED] ORDER REGARDING  
ADMINISTRATIVE MOTION TO  
FILE DOCUMENTS UNDER SEAL**

**[PROPOSED] ORDER**

Upon consideration of the Dell Plaintiffs' Administrative Motion to File Documents Under Seal ("Administrative Motion"), it is hereby

ORDERED that the Administrative Motion is GRANTED; and it is further

ORDERED that the Clerk shall file under seal those portions of Plaintiffs' Reply Brief in Further Support of Their Motion to Partially Exclude the Expert Report and Opinions of Janusz A. Ordoover, Ph.D. identified by Dell in connection with its Administrative Motion.

Dated: \_\_\_\_\_, 2015

---

**The Honorable Samuel Conti**  
**Northern District of California**